

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of:)	
)	
NewWave Communications)	
)	MB Docket No. 17-2
Must-Carry Complaint of Ellington)	
Broadcasting, WHCQ-LD,)	CSR-8932-M
Cleveland, Mississippi)	
)	
To: Media Bureau)	

OPPOSITION

Ultra Communications Group, LLC, d/b/a NewWave Communications (“NewWave”) opposes the must-carry complaint filed by Ellington Broadcasting (“Ellington”)¹ for carriage of WHCQ-LD on the grounds that the station does not qualify for mandatory carriage as a low power television (“LPTV”) station on NewWave’s system serving Leland, Mississippi. The Communications Act and the Commission’s rules are clear: carriage of “qualified” low power television stations applies only in certain limited circumstances. As detailed below, WHCQ-LD fails to meet at least three criteria, and the failure to meet just one disqualifies WHCQ-LD from mandatory carriage. Accordingly, WHCQ-LD does not qualify for must carry on NewWave’s Leland System, and the Bureau must dismiss the Complaint.

¹ *Carriage Complaint Against NewWave Communications by Ellington Broadcasting with Respect to Carriage within the Leland, Mississippi Designated Market Area of Low Power Commercial Television Station WHCQ, Licensed to Cleveland, Mississippi*. CSR-8932-M, MB Docket No. 17-2 (filed Dec. 28, 2016) (“Complaint”).

BACKGROUND

NewWave and the Leland Cable System. NewWave operates twenty-five cable systems in nine states, serving primarily smaller communities and rural areas. The Complaint involves NewWave's Leland, Mississippi system (the "Leland System"), which NewWave has operated since 2013. The Leland System serves approximately 574 customers in Leland and the surrounding area in north Washington County, Mississippi. The system's service area is in the southwestern corner of the Greenwood-Greenville DMA.

Leland is approximately 26.46 miles from WHCQ-LD's transmitter.²

WHCQ-LD. According to Warren's Online TVFactbook,³ WHCQ-LD is a low power commercial broadcast station licensed to Ellington Broadcasting, transmitting on channel 9 from Cleveland, Mississippi in the Greenwood-Greenville DMA. Cleveland is the community of license for the station.

Communications between NewWave and WHCQ-LD. The following chronology details the communications between the parties.

September 2016. On September 28, 2016, Ellington sent a request for must-carry to NewWave.⁴ The letter stated, "[T]his letter should be considered a formal request for cable must-carry of low power television station WHCQ-LD Channel 9 broadcasting from Cleveland, Mississippi." The letter further requested that NewWave

² Exhibit 1 contains a map depicting the Leland System which shows the approximate distance between the system and WHCQ-LD's transmitter.

³ Exhibit 2 contains a copy of WHCQ-LD's Warren's Online TVFactbook page.

⁴ See Complaint at 3 (Letter from David Ellington, Owner, WHCQ-LD to General Manager, New Wave Communications, dated Sept. 28, 2016. The letter notes that the first attempt to contact New Wave by certified mail was returned on Sept. 26, 2016).

carry WHCQ-LD on cable channel 8, the virtual channel for WHCQ-LD, and contended that WHCQ-LD qualified for must-carry on the Leland System because it satisfied all of the Commission's must-carry criteria for low power commercial television stations.

The Complaint. Ellington provides a certificate of service showing a USPS receipt for the September 28, 2016 letter, which shows delivery and receipt by a NewWave representative on October 3, 2016. Ellington therefore argues that, because NewWave failed to respond to the must-carry request within 30 days, the Complaint is timely filed under the established 60-day window during which a broadcaster may file a must-carry complaint.⁵ Utterly absent, however, is an analysis of the six requirements that a low power station must meet to qualify for must carry.⁶ As explained below, WHCQ-LD fails to meet the requirements and is not entitled to must carry on NewWave's Leland System.

ANALYSIS

Both the Communications Act and the Commission's rules require the carriage of "qualified" low power television stations only in certain limited circumstances. An LPTV station will be considered "qualified" if:

- The station broadcasts at least the minimum number of hours required under 47 C.F.R. Part 73;
- The station adheres to Commission requirements regarding non-entertainment programming and employment practices, and the Commission determines that the programming by the LPTV station would address local news and informational needs which are not being adequately served by full power television broadcast stations because of geographic distance of such full power stations from the low power station's community of license;

⁵ See 47 C.F.R. § 76.61(a)(5).

⁶ See 47 U.S.C. § 534(h)(2); 47 C.F.R. § 76.55(d)(1) – (6).

- The station complies with interference regulations consistent with its secondary status;
- The station is located no more than 35 miles from the cable system's headend and delivers to the principal headend an over-the-air signal of good quality;
- The community of license of the station and the franchise area of the cable system are both located outside the largest 160 Metropolitan Statistical Areas on June 30, 1990, and the population of such community of license on that date did not exceed 35,000; and
- There is no full power television broadcast station licensed to any community within the county or other political subdivision (of a State) served by the cable system.⁷

WHCQ-LD fails to meet at least three criteria, and the failure to meet just one disqualifies WHCQ-LD from mandatory carriage. Accordingly, WHCQ-LD does not qualify for must carry on NewWave's Leland System, and the Bureau must dismiss the Complaint.

A. There is a Full Power Station, WXVT, Licensed to Greenville, a Community within Washington County, the county served by the cable system.

LPTV stations are only entitled to must carry if there is no full power television broadcast station licensed to any community within the county served by the cable system.⁸ NewWave's Leland System is located in Washington County, Mississippi. WXVT, a full power commercial broadcast station affiliated with the CBS network, is licensed to Greenville, the county seat for Washington County.⁹ Even a cursory review

⁷ *Id.*

⁸ 47 C.F.R. § 76.55(d)(6).

⁹ Exhibit 3 contains a copy of WXVT's Warren's Online TVFactbook page. See also FCC's online License database for WXVT, available at <https://transition.fcc.gov/fcc-bin/tvq?call=WXVT&arn=&state=&city=&chan=0.0&cha2=69&serv=&type=&facid=&asrn=&list=0&ThisTab=Results+to+This+Page%2FTab&dist=&dlat2=&mlat2=&slat2=&NS=N&dlon2=&mlon2=&slon2=&EW=W&size=9> (last visited Jan. 18, 2017).

by Ellington of WHCQ-LD's market and the area served by the Leland System should have unearthed this vital fact.

Based on WHCQ-LD's failure to meet this factor, the Complaint must be dismissed. Nonetheless, the Complaint also fails to meet two additional requirements, which we address in turn below.

B. The Complaint Fails to Show Its Programming Addresses Needs Not Adequately Served by Full Power Broadcast stations.

It is well-established that LPTV stations bear the burden of producing evidence showing their programming addresses important news and local informational needs not adequately served by full power stations.¹⁰ Only when an LPTV station has demonstrated that it provides local programming does the burden shift to the cable operator to show that full power stations carried by the cable system provide adequate local programming.¹¹

Here, Ellington has not proffered any evidence that WHCQ-LD's programming addresses important news and local informational needs of the communities that NewWave serves. Instead, Ellington includes only one conclusory sentence – in the September 28, 2016 letter – that WHCQ-LD's programming meets local needs not addressed by the area's full power stations, without providing any evidentiary support

¹⁰ *Vision 3 Broadcasting, v. Time Warner Cable, Complaint for Carriage of WVBX-LP, Easton, Glens Falls, and Hudson Falls, New York*, Memorandum Opinion and Order, 14 FCC Rcd 15348, ¶¶ 12-13 (1999) (the Media Bureau dismissed the complaint because the LPTV station failed to produce any evidence concerning local programming, finding the station's unsupported allegations insufficient).

¹¹ *Frances S. Smith d/b/a NCN Cable Advertising v. Cable One, Request for Carriage*, Memorandum Opinion and Order, 18 FCC Rcd 9970 (2003).

for its claim. Ellington has therefore failed to meet its burden, and the Complaint must be dismissed.

C. WHCQ-LD Fails to Deliver a Good Quality Signal to the Leland System's Principal Headend.

LPTV stations must meet the same signal strength requirements as a full power commercial station. Moreover, unlike a full power station, an LPTV station cannot cure a signal strength deficiency solely through a commitment to provide specialized equipment.¹²

Here, WHCQ-LD fails to satisfy one of the fundamental requirements of must carry – delivery of a good quality signal at or above -61 dBm. Due to low transmitter power and the distance between the station's transmitter and the Leland System headend, WHCQ-LD cannot deliver a good quality signal.

In response to the Complaint, and despite the presence of a full power station licensed within the same County, NewWave conducted a thorough signal strength test on January 5, 2017.¹³ Those tests confirmed that WHCQ-LD failed to deliver a good quality signal. The signal strength reading was only -40 dBm, well under the good quality signal threshold. The Communications Act, Commission regulations and

¹² See *Complaint of Seeway Broadcasters against Continental Cablevision of Ohio, Petition for Reconsideration*, Memorandum Opinion and Order, 13 FCC Rcd 20835, ¶ 8 (1998) (“[N]either the 1992 Cable Act nor [the Commission's] rules allows a low power television station to cure a signal quality deficiency with additional equipment as full power television stations are allowed to do.”); see also *WMTY, Inc. v. James Cable Partners; Request for Mandatory Carriage of Television Station W24DC Hamilton, Alabama*, Memorandum Opinion and Order, 21 FCC Rcd 11709 (2006). A cable operator is also not required to carry an LPTV station with inadequate signal strength, even if the cable system carries other stations delivering similar signal levels. *Billy Ray Washington v. Mediacom Communications Corp.; Request for Carriage of Television Station W62DE, Tifton, Georgia*, Order on Reconsideration, 21 FCC Rcd 11706, ¶ 7 (2006).

¹³ A copy of the signal strength test performed by New Wave is attached as Exhibit 4.

precedent lead to only one conclusion: when a local commercial broadcaster fails to deliver a good quality signal to a system's principal headend, the station is not entitled to mandatory carriage. Accordingly, the Bureau must dismiss the Complaint.

CONCLUSION

As discussed above, WHCQ-LD does not qualify for must carry on NewWave's Leland System. The Media Bureau must dismiss the Complaint.

The undersigned verify that they have read this Opposition and to the best of their knowledge, information and belief formed after reasonable inquiry, the Opposition is well grounded in fact and is warranted by existing law, and it is not interposed for any improper purpose.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "Scott C. Friedman", is written over a horizontal line.

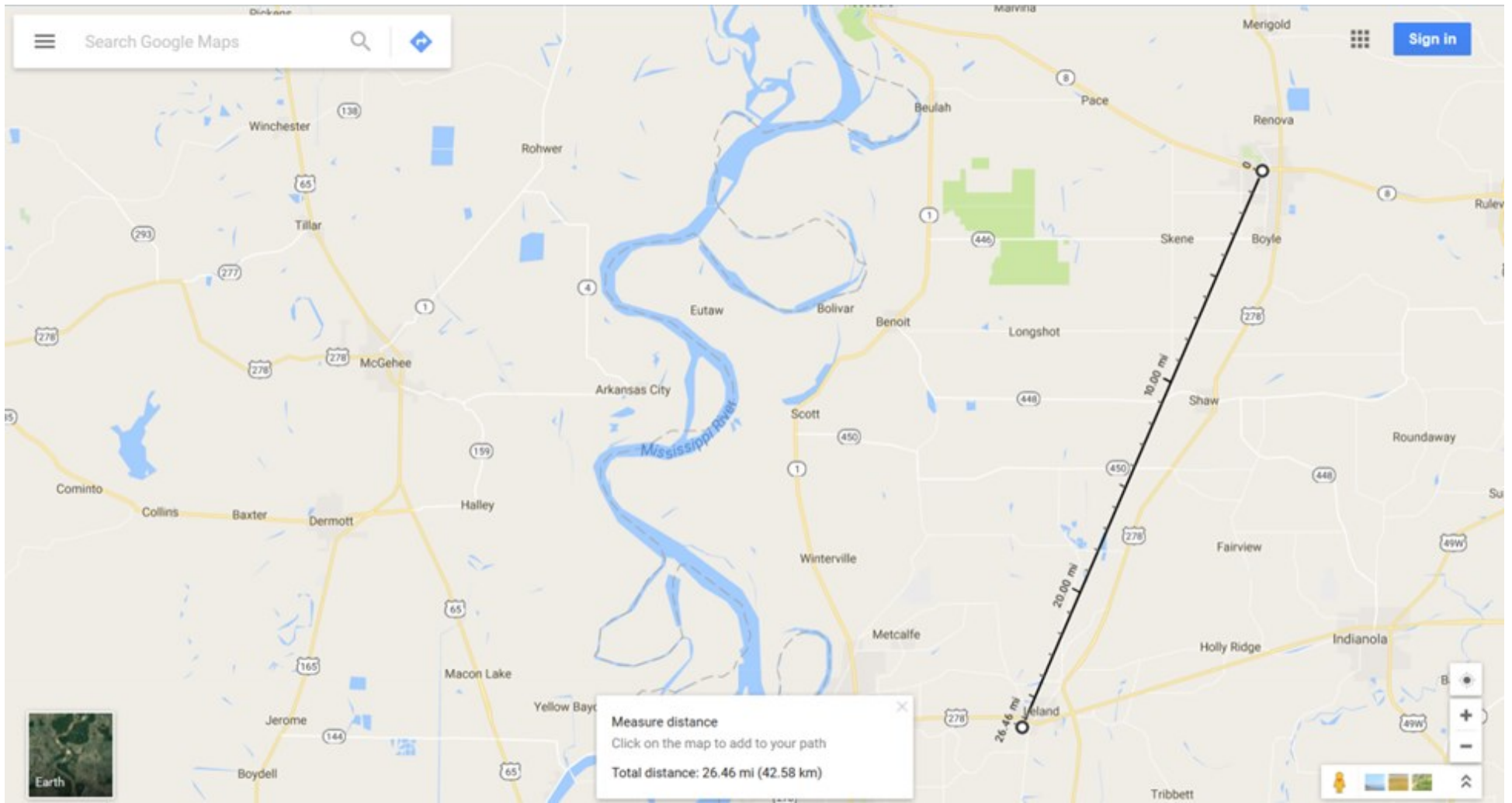
By:

Scott C. Friedman
Becca A. Rabin
Elizabeth M. Cuttner
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Suite 1020
Chicago, IL 60601
(312) 372-3930

Attorneys for Ultra Communications
Group, LLC

January 24, 2017

Exhibit 1



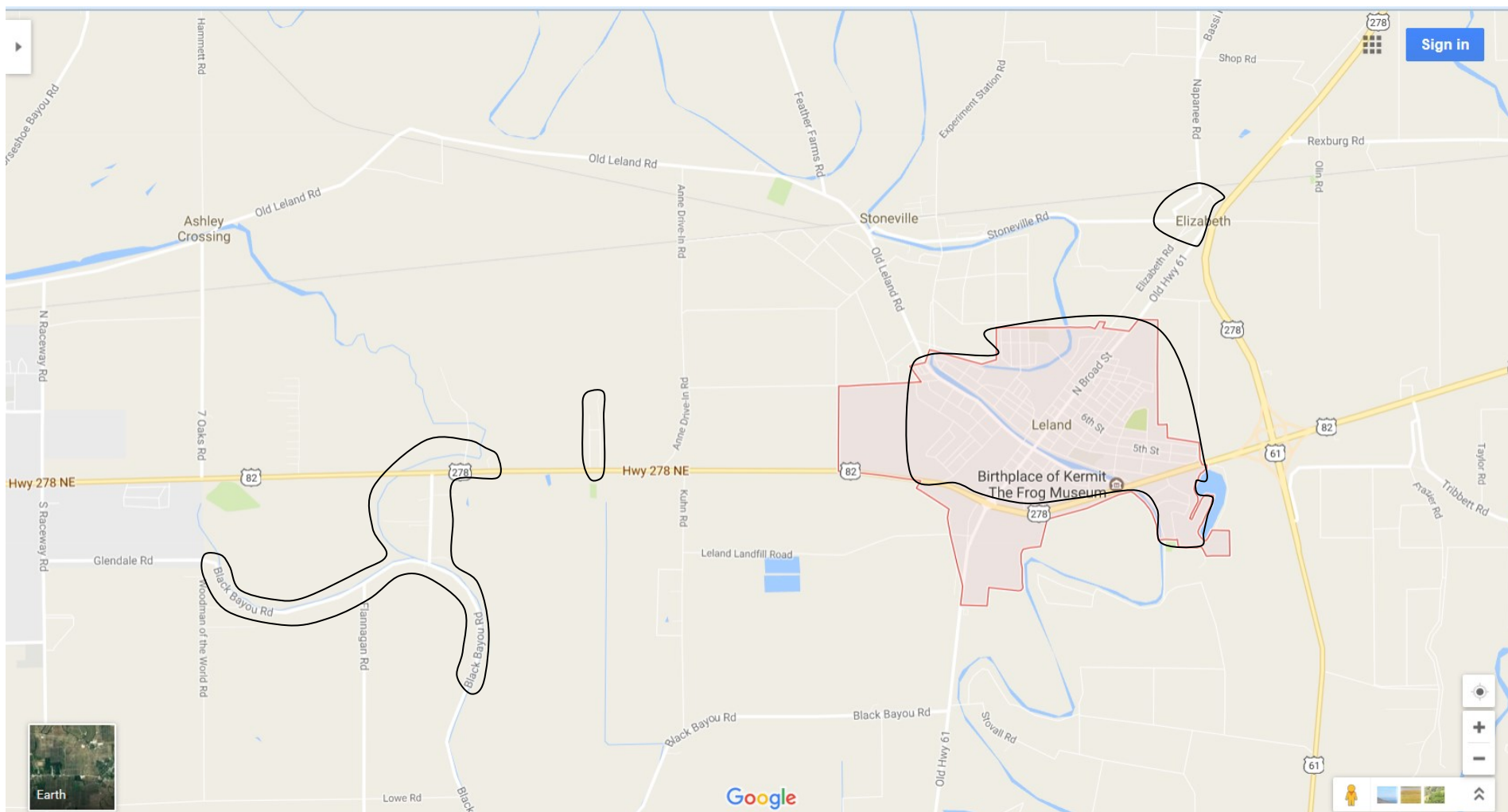



Exhibit 2

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Call Letters	WHCQ-LD (America One, COZI TV, ION) Cleveland (Ch 9) Cleveland, MS
Phone	662-375-2654
Email	dellington@cableone.net
Website	http://www.ionline.tv
Operating Status	Operating, Low Power/Translator
Network Service	ION, America One, COZI TV
Licensee	David Ellington PO Box 617 Webb, MS 38966
Studio Address	1321 Hwy 8 West Ste 12 Cleveland, MS 38732
Mailing Address	Ellington Broadcasting PO Box 617 Webb, MS 38966
Personnel	Chad Ellington , General Manager
Ownership	David Ellington
Began Operation	March 20, 1990
Technical Facilities	Operating Power Channel Number: 9 (186-192 MHz) Latitude: 33° 43' 36" Longitude: 90° 43' 44" Antenna: 0-ft. above av. terrain, 410-ft. above ground, 550-ft. above sea level ERP Power: 0.3 Application File Number: BMPDVL-20090916ADE Holds CP for change to... Channel Number: 0 (Holds CP for change to... Channel Number: 0 (MHz) Latitude: 33° 43' 35.59" Longitude: 90° 43' 43.65" Antenna: -ft. above av. terrain, -ft. above ground, -ft. above sea level ERP Power: 3 Application File Number: 0000014139
City of License	Cleveland
Station DMA	Greenwood-Greenville, MS (Rank: 193)

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Exhibit 3

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Call Letters	WXVT (CBS) Greenville (Ch 15) Greenville, MS
Phone	662-334-1500
Fax	662-378-8122
Email	abrasier@wxvt.com
Website	http://www.wxvt.com
Operating Status	Operating, Commercial full power
Network Service	CBS
Licensee	John Wagner 2029 Century Park East Ste 2010 Los Angeles, CA 90067
Studio Address	3015 East Reed Rd Greenville, MS 38703
Mailing Address	WXVT 3015 East Reed Rd Greenville, MS 38703
Personnel	Gavin Maliska , General Manager & News Director Donny Reid , Chief Engineer Amanda Brasier , Business Manager Carolyn Byars , Program Director Steve Ross , Production Manager & Creative Services Director Cassandra Robinson , Traffic Manager
Ownership	John Wagner
Began Operation	May 01, 2002 Began analog operations: November 7, 1980. Sale to Lamco Communications by Big River Broadcasting Co. approved by FCC March 5, 1984. Sale to Greenville Television Inc. approved by FCC August 28, 1991. Sale to Saga Broadcasting LLC by Greenville Television Inc. approved by FCC April 22, 1999. Ceased analog operations: February 17, 2009. Sale to H3 Communications LLC (Christopher Harker, Jamie Harker & Timothy Harker) by Saga Broadcasting LLC approved by FCC January 28, 2013. Application was amended December 21, 2012 to include joint sales and shared services agreements with Commonwealth Broadcasting Group's WABG-TV Greenville, MS. Assignment of license to John Wagner by H3 Communications LLC approved by FCC February 19, 2016
Represented	(Legal) Edinger Associates PLLC (Sales) Blair Television
Technical Facilities	<i>Operating Power</i> Channel Number: 15 (476-482 MHz) Authorized power: 330-kw max. visual Latitude: 33° 39' 26" Longitude: 90° 42' 18" Antenna: 883-ft. above av. terrain, 881-ft. above ground, 1,011-ft. above sea level Application File Number: BPCDT-20080303ACC
Local marketing agreement with	WABG-TV (ABC, FOX) Greenwood

Note: Latitude and longitude coordinates shown are based on the North American Datum of 1927 (NAD 27) as currently required by the Mass Media Bureau of the FCC

Coverage Map



Nielsen TV Station Circulation

Circulation © 2016 Nielsen. Coverage based on Nielsen study.

Grand Total	Cable TV Households	Non-cable TV Households	Total TV Households
Estimated Station Totals*	20,552	22,819	43,371
Average Weekly Circulation (2016)	20,552	22,819	43,371
Station DMA Total	Cable TV Households	Non-cable TV Households	Total TV Households
Estimated Station Totals*	19,070	22,410	41,480
Average Weekly Circulation (2016)	19,070	22,410	41,480
Other DMA Total	Cable TV Households	Non-cable TV Households	Total TV Households
Estimated Station Totals*	1,482	409	1,891
Average Weekly Circulation (2016)	1,482	409	1,891

*Estimated station totals are sums of the Nielsen TV and Cable household estimates for each county in which the station registers viewing of more than 5% as per the Nielsen Survey Methods.

City of License	Greenville
Station DMA	Greenwood-Greenville, MS (Rank: 193)

Exhibit 4

NewWave Communications

WHCQ-LD Channel 8

SIGNAL TEST DATA

January 5, 2017

NewWave Communications Signal Strength Test Report

STATION

Station: WHCQ-LD

Channel: 8

Frequency: __187 MHz__

Headend: Leland, MS

Latitude: __33-43-36__

Longitude: __90-43-44__

BEARING TO STATION

(Antenna Oriented for Maximum Signal Level): __yes__

Distance to Station: _26 Miles

Receiving Tower Height: 302'

Receiving Antenna Height: 10'

Measuring Instrument Manufacturer: JDSU

Make/Model: Dsam6300

Age of Unit: 3 months

Calibration Date: At time of purchase

ANTENNA

Antenna Manufacturer:

Model: CM-3018

Gain: 8.2dB

Range: 60 miles

Radiation Pattern: NA

[illegible]

fccdata.org/?facid=15658

USA (AM/FM/TV) USA (Amateur) Canada UK/Ireland Australia Japan/日本

Facility ID Call Sign Community Name CDBS ARIN/LMS File#

Search by Party Name Licensee Search

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WHCQ-LD
CLEVELAND MS US

DAVID ELLINGTON
P. O. BOX 617
WEBB MS 38966

DIGITAL TV
TRANSLATOR/LPTV
Channel 9
Facility ID: 15658
Fully Licensed

Donate

1. MOD 0000014193 GRANTED 11/14/2016
Record Type: Low Power Digital TV
Application Purpose: Modification (Minor)
Channel: 9
Construction Permit Expires: 11/14/2019
SITE # 1
NAD83 Coordinates: 33 43' 36.0" N / 90 43' 44.0" W
NAD27 Coordinates: 33 43' 35.59" N / 90 43' 43.65" W
Elevation: 42.7 m AMSL
Antenna Type: PSI PSIMLP20I
Antenna Polarization: Horizontal
Effective Radiated Power: 3.0 kW
Radiation center-above mean sea level: 167.7m
Overall antenna height above ground: 128.0m
Non-Directional Antenna
Antenna System ID: 59218

Rad Field	dB	ERP/Field	dB	ERP/Field	dB	ERP
0 1.000	0.0	3.000	90 1.000	0.0	3.000	276 1.000 0.0 3.000
10 1.000	0.0	3.000	100 1.000	0.0	3.000	190 1.000 0.0 3.000
20 1.000	0.0	3.000	110 1.000	0.0	3.000	200 1.000 0.0 3.000
30 1.000	0.0	3.000	120 1.000	0.0	3.000	210 1.000 0.0 3.000
40 1.000	0.0	3.000	130 1.000	0.0	3.000	220 1.000 0.0 3.000
50 1.000	0.0	3.000	140 1.000	0.0	3.000	230 1.000 0.0 3.000
60 1.000	0.0	3.000	150 1.000	0.0	3.000	240 1.000 0.0 3.000
70 1.000	0.0	3.000	160 1.000	0.0	3.000	250 1.000 0.0 3.000
80 1.000	0.0	3.000	170 1.000	0.0	3.000	260 1.000 0.0 3.000

Show More Application Details

2. BLDVL-20091023AAX GRANTED 11/02/2009
Record Type: Digital TV Translator or LPTV Station
Domestic Status: License
Channel: 9
NAD27 Coordinates: 33 42 26.01" N 90 42 42.00"

Map Satellite

Google

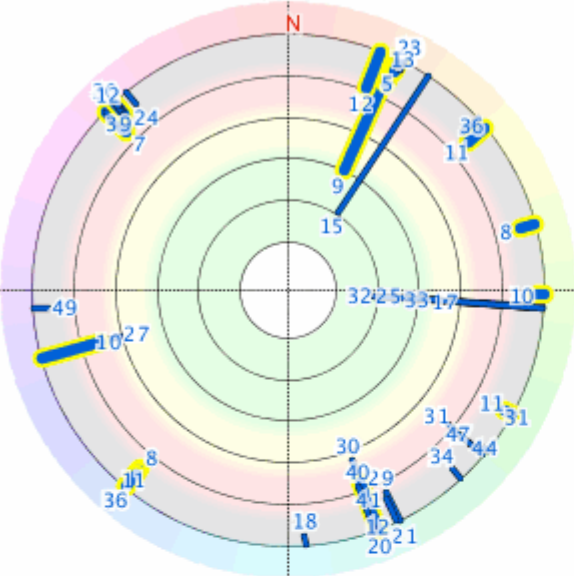
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Desktop Address 9:32 AM 1/4/2017

Ileland All Channels

TrueNorth

N



Search Criteria

Address: exact
Leland, MS
Postal code 38756
Height: 200.0 ft.

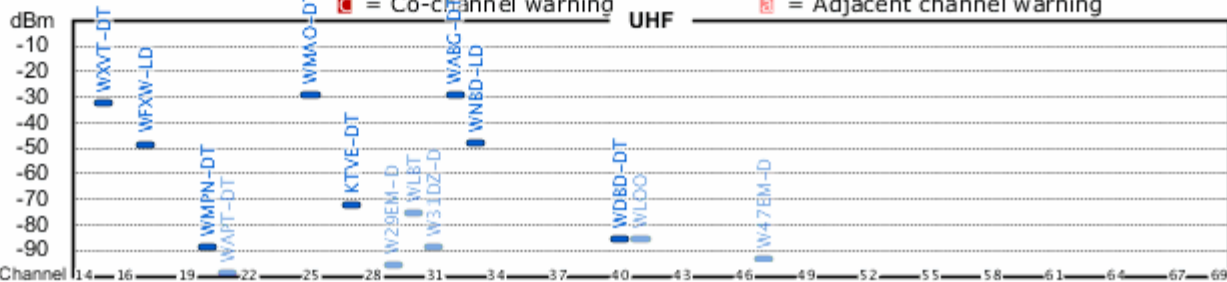
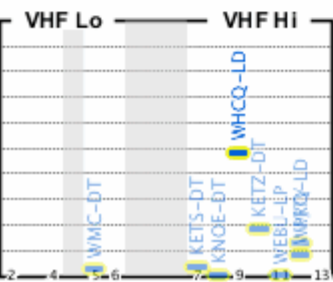
db datecode
201701050919

www.tvfool.com

Callsign	Real	(Virt)	Netwk	NM(dB)	Pwr(dBm)	Path	Dist miles	True	Azimuth (Magn)
WABG-DT	32	(6.1)	ABC	61.6	-29.3	LOS	21.4	94°	(95°)
WMAO-DT	25	(23.1)	PBS	61.5	-29.3	LOS	21.3	94°	(94°)
WXVT-DT	15	(15.1)	CBS	58.4	-32.4	LOS	21.5	33°	(34°)
WNBD-LD	33			43.2	-47.6	LOS	21.4	94°	(95°)
WFXW-LD	17			42.5	-48.3	LOS	21.4	94°	(95°)
WHCQ-LD	9			39.4	-51.4	LOS	25.1	25°	(25°)
KTVE-DT	27	(10.1)	NBC	18.9	-72.0	1Edge	79.4	254°	(255°)
WLBT	30		NBC	15.6	-75.3	1Edge	87.1	159°	(160°)
KETZ-DT	10			8.9	-81.9	1Edge	79.3	254°	(255°)
WDBD-DT	40	(40.1)	Fox	5.5	-85.3	2Edge	87.1	159°	(160°)
WLOO	41	(35.1)		5.5	-85.4	2Edge	87.1	159°	(160°)
WJTV	12	(12.1)	CBS	3.6	-87.2	2Edge	84.9	160°	(160°)
W31DZ-D	31			2.3	-88.6	2Edge	31.3	130°	(131°)
WMPN-DT	20	(29.1)	PBS	2.2	-88.7	2Edge	88.0	160°	(161°)
WPRQ-LD	12			-1.0	-91.9	2Edge	57.8	21°	(21°)
W47EM-D	47			-2.2	-93.0	2Edge	31.3	130°	(131°)
W29EM-D	29			-4.9	-95.7	2Edge	54.8	154°	(155°)
KETS-DT	7		PBS	-5.5	-96.3	2Edge	104.1	314°	(315°)
WMC-DT	5	(5.1)	NBC	-6.4	-97.2	Tropo	135.5	25°	(26°)
WAPT-DT	21	(16.1)	ABC	-8.3	-99.1	Tropo	85.0	155°	(155°)
KNOE-DT	8	(8.1)	CBS	-8.9	-99.8	Tropo	106.7	220°	(220°)
WEBU-LP	11	(11.1)		-9.0	-99.9	2Edge	64.3	50°	(51°)
KMLU	11			-10.1	-101.0	Tropo	106.7	220°	(220°)
WMAV-DT	36	(18.1)	PBS	-10.2	-101.0	2Edge	92.7	48°	(48°)
KARD-DT	36	(14.1)	Fox	-10.6	-101.5	Tropo	116.1	220°	(220°)
KASN-DT	39	(38.1)	CW	-11.0	-101.8	Tropo	104.1	314°	(315°)
KLTN-DT	13	(13.1)	PBS	-12.3	-103.1	Tropo	106.7	220°	(220°)
WTVA-DT	8	(9.1)	NBC	-12.6	-103.4	Tropo	108.6	75°	(75°)
KVTN	24	(25.1)	Ind	-12.6	-103.5	Tropo	101.9	321°	(321°)
KTHV-DT	12	(11.1)	CBS	-12.9	-103.8	Tropo	132.9	317°	(318°)
KMYA-DT	49			-13.0	-103.9	Tropo	104.1	266°	(266°)
WRBJ	34	(34.1)	CW	-13.2	-104.1	Tropo	118.3	138°	(138°)
KLRT-DT	30	(16.1)	Fox	-13.6	-104.5	Tropo	132.6	317°	(318°)
WHBQ-TV	13	(13.1)	Fox	-14.0	-104.8	Tropo	136.9	26°	(27°)
KARK-TV	32	(4.1)	NBC	-14.1	-105.0	Tropo	132.9	317°	(318°)
KARZ-DT	44	(42.1)		-15.8	-106.7	Tropo	132.9	317°	(318°)
WTWV-DT	23	(14.1)		-15.9	-106.7	Tropo	139.8	26°	(27°)
WREG-DT	28	(3.1)	CBS	-15.9	-106.7	Tropo	137.6	26°	(27°)
WMAU-DT	18	(17.1)	PBS	-15.9	-106.7	Tropo	139.7	176°	(177°)
WATN-TV	25	(24.1)		-15.9	-106.8	Tropo	144.9	26°	(27°)
WKNO-DT	29	(10.1)	PBS	-16.0	-106.9	Tropo	136.2	27°	(27°)
WTOK-TV	11	(11.1)	ABC	-16.1	-107.0	Tropo	148.6	119°	(120°)
WMAB-DT	10	(2.1)	PBS	-16.6	-107.4	Tropo	101.8	91°	(92°)
WLMT-DT	31	(30.1)	CW	-17.2	-108.0	Tropo	144.9	26°	(27°)
KATV	22	(7.1)	ABC	-17.4	-108.2	Tropo	132.4	317°	(318°)
WBUY-TV	41	(40.1)	Ind	-18.0	-108.8	Tropo	144.9	26°	(27°)
WPXX-DT	51	(50.1)	MyN	-18.1	-109.0	Tropo	139.9	26°	(27°)
WMAW-TV	44	(14.1)	PBS	-18.3	-109.2	Tropo	136.7	129°	(129°)
WGBC-DT	31	(30.1)	NBC	-19.7	-110.6	Tropo	148.5	119°	(120°)
WMDN-DT	24	(24.1)	CBS	-20.1	-111.0	Tropo	148.5	119°	(120°)
WJMF-LP	6			-20.7	-99.6	2Edge	85.0	155°	(155°)

■ = Co-channel warning

■ = Adjacent channel warning



Certificate of Service

I, Alma Hoxha, paralegal with the law firm of Cinnamon Mueller, hereby certify that a copy of the Opposition was served via Certified Mail, Return Receipt Requested on the 24th day of January, 2017 to the following:

David Ellington
Ellington Broadcasting
P.O. Box 617
Webb, MS 38966

A handwritten signature in black ink, appearing to read 'Alma Hoxha', written over a horizontal line.

Alma Hoxha
Paralegal